



# LEAGUE OF WOMEN VOTERS OF CALIFORNIA

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December 4, 2002

Jonas Minton, Deputy Director  
California Department of Water Resources  
1416 Ninth Street, P.O. Box 942836  
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RE: Progress of Bulletin 160-03

Dear Jonas:

As representatives of the League of Women Voters of California, we are pleased to be serving on the Advisory Committee (AC) for the current update of Bulletin 160, the California Water Plan. We commend your efforts to make this a different process from other bulletin updates, one that provides greater leadership and vision about the challenges and options facing water decision makers in the future.

The time constraints imposed by legislative mandate mean that DWR will be unable to put together the type of document originally envisioned and agreed upon through consensus by AC members. The result has been a cut back that seems serious. We hope, however, that it is not too late to address the following concerns more fully in the upcoming update. This seems crucial for the success of Bul 160-03.

1. Most important to the League is the question of analyzing soft path approaches to water resource planning and development. This should include not only conservation and reclamation but also newer, creative ideas such as stormwater use, and greater efficiencies that may not be considered cost effective at this time. Some of them may be cost effective if environmental and alternative costs for conventional new storage are included in the analysis.

It is important to keep in mind the distinction between natural capital (nature's resources), physical capital (infrastructure created by people) and human capital (the knowledge and skills we apply). We think a more complete soft path analysis in Bul 160 would reveal how to use natural water resources more effectively in ways that are least destructive to the environment. The work of the AC on scenarios and responses—proposing to use a range of figures—seemed more comprehensive than the modified approach. We hope a greater emphasis on the soft path approach can be restored to Bul 160-03

2. The limitations of existing models need to be made clear in the Bulletin. In addition, an indication of the direction modeling will take in the future should be included so that more efficient and accurate models can be developed and used for water planning.

3. League positions are strong on environmental restoration and preservation. We think it is imperative that Bul 160 identify (with quantification when possible) how the state plans to meet environmental needs for water, both those currently acknowledged as well as unmet needs. Again, it is important to accept the concept of conserving the environment as a source of capital as well as a resource (as when water percolates into an aquifer to be used again). We hope for greater analysis of the many environmental issues associated with water.
4. It is crucial, too, that the update include a discussion of environmental justice in water resources and that policy approaches be assessed in terms of equity of outcomes.
5. We applaud the effort to develop possible future scenarios and we suggest that Bul 160-03 needs to emphasize the scenario development process even if the scenarios chosen are limited in number and incomplete. It is important that users of Bul 160-03 get a sense of how these scenarios will likely develop.
6. Finally, we urge that the Bulletin give greater emphasis to comprehensive water management. This includes all of the above as well as analyses of regional programs and an overview of where we are now—and a road map for the future. Management means recommending some sort of preferred plan or plans for the future—or options based on trends and the hard choices ahead. It means that the Bulletin can become less of a reference—as it often has seemed in the past—and can serve to a greater extent as an overall guide for water management in years to come. The scenarios and responses worked over and over by the AC did seem to point in this direction.

While we realize some whittling is necessary, we are confident you will do your best to include a greater analysis of some the above concerns in the final version. We look forward to working further with you, the staff and Advisory Committee members over the next year. Thank you for this opportunity to express our point of view.

Sincerely,



Polly Smith



Jack Sullivan

cc: Barbara Inatsugu, President, League of Women Voters of California  
Robin Tokmakian, LWVC Natural Resources Director  
Roberta Borgonovo, LWVC Co-Director, Water



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